

EXHIBIT A

COURT OF APPEAL, FIRST CIRCUIT
STATE OF LOUISIANA
DOCKET NO. 2017-CA-1141

VOICE OF THE EX-OFFENDER, ET AL.,

Plaintiffs-Appellants

■

STATE OF LOUISIANA, ET AL.,

Defendants-Appellees

On Appeal
19th Cir.
Harrisburg, Pa.
12, State
Docket No. 649587
Hobbs, Pa.

AMICI CURIAE BRIEF BY NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC., THE SENTENCING PROJECT, &
SOUTHERN POVERTY LAW CENTER
IN SUPPORT OF PLAINTIFFS-APPELLANTS

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ARGUMENT

- I. FELONY DISENFRANCHISEMENT LAWS, INCLUDING LOUISIANA'S, ARE INCONSISTENT WITH THE FUNDAMENTAL PRINCIPLE OF AN INCLUSIVE SOCIETY.

- A. Louisiana's Felony Disenfranchisement Law Is Rooted in Racial

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¹⁹ Ker supra 18 at 111-12.

²⁰ Ap O Br at 5-6, n1; at VI, §4 (1812).

see also Ap R Br at 15 n1 (g

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²¹ Ap O Br at 5-6, n1 (p a

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at VI, §4 (1812)).

²² Id. at 6 (L a . C o a r V I I I , § (1 9 2 1)) .

²³ H y supra 2 at 92-93.

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²⁸ Louisiana, 225 F. Spat 367-70.

²⁹ Id. at 369.

³⁰ Id. at 371.

³¹ Id.

³² Id.

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33 Louisiana 225 F. Spat373.

34 Id. at 374 (1858, 33-35) (e

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Id. at376.

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³⁹ Linn 1895, StCah p11a

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³⁹ Hunter, 471 U.S. at226-27.

⁴⁰ Hay supra n2 at87-88.

⁴¹ See Ratliff v. Beale, 20 So865, 868 (Ms 1896) (haz BkAimstf

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⁴² Lata L. Mcay Suffering from Past Evils: How Alabama's 1901 Constitution Played a Hand in the 2008 Presidential Election, 12 B.J. Af-Am L. & Pk4, 9 n22 & 25 (2010).

2. The Fear of Purported Criminality of Black People Has Also Led to the Adoption in Louisiana and Elsewhere of Felony Disenfranchisement Statutes.

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II. RESTORATION OF VOTING RIGHTS FOR PEOPLE WITH FELONY CONVICTIONS ON PROBATION AND PAROLE WOULD STRENGTHEN COMMUNITIES IN LOUISIANA AND HAS WIDE PUBLIC SUPPORT.

A. Expanding Voter Eligibility in Louisiana and Elsewhere Leads to More Inclusive Communities by Increasing Civic Engagement and Public Safety.

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⁷⁷ See, e.g., *supra* note 76 at 74041.

⁷⁸ See, e.g., *supra* note 6; *supra* note 4.

⁷⁹ *supra* note 1, & *supra* note 2.

Transition and the Civic Reintegration of Convicted Felons in Louisiana: A Case Study

of the Louisiana Department of Corrections

Working Paper (2004).

Less than the Average Citizen: Stigma, Role

Transition and the Civic Reintegration of Convicted Felons in Louisiana: A Case Study
Criminology, 25(2), 259-60 (Shanley & Rasmussen, 2004).

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B. The Nationwide Momentum Against Disenfranchisement Laws Supports Expansion of Voting Rights for Individuals with Felony Convictions in Louisiana

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⁸⁹ Mark D. ... Prisoner Disenfranchisement Policy: A Threat To Democracy, 235, 243 (2005).

⁹⁰ Id. (H. ... Outsiders: Studies in the sociology of deviance (1963)).

⁹¹ Felony Disenfranchisement: A Primer, supra note 4 at 5.

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Pp(2010) at1-2, p/bi/2k81y

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The Court has found that the Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813. The Court has also found that the Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813. The Court has also found that the Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813.

CONCLUSION

When a State denies the right to vote to a particular class of citizens, it is not violating the Constitution. The Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813. The Court has also found that the Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813. The Court has also found that the Constitution does not require the States to provide a right to vote to any particular class of citizens. See *Richardson-Velarde*, 517 U.S. at 813.

Date: Nov 6, 2017

Respectfully,
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President & Director-Counsel
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¹⁰³ P. Expanding the Vote, supra note 3 at 3; see also Bar P. M. H. Aden, Lan B., Barred from the Vote: Public Attitudes Towards the Disfranchisements of Felons 30 Fla. B. L. J. 1519, 1540 (2003) (H. 81.7 p. 1519); J. F. Man, Ch. B. Ad. C. U. G. Public Attitudes Toward Felon Disenfranchisement in the United States, 88 Ph. Op. 275, 281 (2004) (H. 80 p. 275).

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